



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EMR/GN
F.#2018R02232

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 14, 2023

By ECF and Email

The Honorable Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Jacob Daskal
Criminal Docket No. 21-110 (NGG)

Dear Judge Garaufis:

The government writes to inform the Court that the parties in the above-captioned matter have agreed to enter into an agreement pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C), and to provide the Court with the basis for that agreement. Pursuant to the parties' agreement, the parties have agreed that the defendant would plead guilty to Count Two of the superseding indictment for transporting a minor with intent to engage in criminal sexual activity, in violation of 18 U.S.C. § 2423(a), and be sentenced to a sentence within the Guidelines range of 168 to 210 months' imprisonment, followed by a period of supervised release of five years. For the reasons set forth below, the government respectfully requests that, at the change of plea hearing scheduled for July 14, 2023 at 3:00 p.m., the Court: (1) accept the defendant's plea of guilty; and (2) accept the parties' plea agreement (the "Plea Agreement," attached as Exhibit A) as provided for under Federal Rule of Criminal Procedure 11(c)(1)(C).

I. Procedural Posture

As the Court is aware, the defendant is charged on a two-count superseding indictment for using an interstate facility to coerce a minor to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2422(b) (Count One), and transportation of a minor with intent to engage in criminal sexual activity, in violation of 18 U.S.C. § 2423(a) (Count Two), for sexually abusing a 15-year-old girl in his care when he was 58 years old. Jury selection in this matter is currently scheduled for Monday, July 17, 2023 at 8:30 a.m. before Judge Bloom.

II. The Parties' Agreed Upon Sentence

The agreed-upon sentencing range of 168-210 months' imprisonment followed by a 5-year term of supervised release appropriately balances the defendant's criminal history and

In the judgment of the government, a sentence in the agreed-upon sentencing range appropriately balance the prosecutorial interests of the Office with the need for a severe sentence for a very serious crime. For the foregoing reasons, the government respectfully requests that, at the change of plea hearing scheduled for July 14, 2023, the Court: (1) accept the defendant's plea of guilty; and (2) accept the Plea Agreement pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C).

BREON PEACE
United States Attorney

cc: Clerk of Court (NGG) (by ECF)
Defense counsel (by ECF)